



## State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Jim Doyle, Governor  
Matthew J. Frank, Secretary

101 S. Webster St.  
Box 7921  
Madison, Wisconsin 53707-7921  
Telephone 608-266-2621  
FAX 608-267-3579  
TTY Access via relay - 711

January 23, 2009

Ken Salazar, Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington DC 20240

Dear Secretary Salazar,

Let me congratulate you on your appointment and confirmation as the 50<sup>th</sup> Secretary of the Department of Interior. The Wisconsin Department of Natural Resources has a long history of working with your Department on a wide range of issues – issues critical to each of our agencies as stewards of the country's natural resources. I am looking forward to working with you.

We appreciate the fact that the new administration has put a hold on pending rules from the outgoing administration to give you time to review those rules before implementation. Although I realize you have a long list of demands facing you as you begin your work in the new administration, I am requesting that you prioritize your review of the delisting rule for wolves in the Western Great Lakes. I'd like to share some information with you regarding an issue that has significant ramifications for Wisconsin's wolf management program.

The recovery of the wolf in Wisconsin has been a real success story for the U.S. Fish and Wildlife Service, for the Wisconsin Department of Natural Resources – and for all the partners who have been instrumental in this recovery effort. Over the past 10 years, a number of steps have been taken to delist the wolf – as appropriate given the success of the recovery. We continue to be in support of delisting, given that success, and given the importance of removing the wolf from the endangered species list in order to provide the flexibility we need to manage the wolf population in Wisconsin, in accordance with our approved Wolf Management Plan.

The most recent effort to delist the wolf resulted in an announcement earlier this month, of the publication of a final rule to delist wolves in the Western Great Lakes – which includes Wisconsin's wolf population. Since the wolf was listed as a federally endangered species in 1974, we have worked in partnership with the U.S. Fish and Wildlife Service and others, on the recovery and management of the wolf population in Wisconsin. In the 1970's estimates were that Wisconsin's wolf population consisted of only a few animals. As part of the Federal Recovery Plan developed in 1978 and updated in 1992, population goals for delisting the wolf in the region were established at 1,250 to 1,400 wolves in Minnesota and a combined population of 100 wolves in Wisconsin and Michigan. Through population surveys conducted each year since 1979, in 2008 the wolf population had grown to 2,921 in Minnesota, 509 in Michigan, and 537 in Wisconsin - thus the Minnesota population as of 2008 was 2.5 times the delisting goals that had been established, and combined Wisconsin/Michigan population was 10 times that goal.

The wolf populations in Wisconsin and adjacent states have expanded far beyond the original goals of the recovery plan for wolves in this region. The protections of the Endangered Species Act – have been

critical to this recovery. However, the current population levels now require the use of more flexible management approaches included in Wisconsin's Wolf Management Plan. While the growth of the wolf population has had benefits to the ecosystem and for endangered species management, there has also been an increase on depredation on livestock and pets. In 2007, 30 farms across Wisconsin suffered depredation on livestock. In recent years as many as 25 dogs have been killed by wolves. Farmers across northern and central Wisconsin are becoming more fearful of wolves and worry about their ability to protect livestock. Rural landowners are becoming concerned about walking their dogs, and hunters have raised the issue of wolves competing with them for deer. We have conducted extensive educational and public outreach programs on wolves, and while attitudes toward these large predators improved in the 1980s and 1990s, attitudes may be eroding especially in rural areas of northern and central Wisconsin.

The recovery of wolves and the process to remove wolves from the federal list of endangered species has been long. As a partner in the recovery of gray wolves in the region, the Wisconsin DNR has developed strong conservation programs to maintain healthy populations of wolves on the landscape. But the state needs the relief provided by a more flexible management system to adequately manage wolves and keep wolf-human conflict to minimum levels, which in the long-run will assure the survival of gray wolves in the region. A major tenet of the Act was that once species populations recover, management would return to the states, to allow more localized controls of wildlife populations.

It's important to us – to our wolf management program – that steps be taken allow the rule to delist wolves to go forward as soon as possible. It's critical that this rule be in effect soon so that we are able to authorize trapping of problem wolves by USDA-Wildlife Services when calving begins in the spring. As you may know under endangered species listing, the states do not have any authority to conduct lethal take of wolves, unlike experimental populations in the western states that have had more flexible management authority. We also need authority to allow landowners to be able to shoot wolves attacking their cattle. Once cattle are put out on pasture in spring, risk of wolf depredation will increase and special tools including lethal controls are necessary to minimize losses. Translocation of problem wolves is no longer feasible in Wisconsin because all suitable wolf range is currently occupied by wolves.

We hope you are able to move quickly to approve the delisting rule. It is time to celebrate this successful recovery of an endangered species, and return management authority to the states and Indian tribes of the region as is intended by the Endangered Species Act. We're ready to assist you and your staff in any way we can as you review this pending rule and make decisions on whether to move it forward.

Please let me know if you have questions or if there is additional information and background on the Wisconsin wolf management program that would be helpful to you.

Thank you for your consideration.

Sincerely,



Matthew J. Frank  
Secretary

cc: Tom Melius, U.S. Fish and Wildlife Service  
Rowan Gould, Acting Director U.S. Fish and Wildlife Service